

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MILTON GREEN,)	
)	
Plaintiff,)	Case No. 4:19-cv-1711-DDN
)	
v.)	
)	
CITY OF ST. LOUIS <i>et al.</i>,)	
)	
Defendants.)	

DEFENDANTS' RESPONSE
TO THE ST. LOUIS POST-DISPATCH'S MOTION TO INTERVENE

COME NOW Defendants City of St. Louis ("City") and Christopher Tanner ("Tanner") (collectively "Defendants"), by and through their attorney Sheena Hamilton, City Counselor for the City of St. Louis, and for their Response to the St. Louis Post-Dispatch, LLC's Motion to Intervene state as follows:

Defendants have no objection to the St. Louis Post-Dispatch's Motion to Intervene. In the event the Court grants the Post-Dispatch's Motion to Intervene and grants the Post-Dispatch permission to file their proposed Motion to Unseal as requested, Defendants will file their response to the Post-Dispatch's Motion to Unseal within 14 days of its filing pursuant to E.D. Mo. L.R. 4.01(B).¹

¹ The Post-Dispatch requests permission to file their Motion to Unseal and Memorandum in Support thereof. *See* Doc. 142 at 6 ("The Post-Dispatch respectfully requests that this Court ... permit it to file its Motion to Unseal...and its Memorandum in Support of the Motion to Unseal..."). Thus, the Motion to Unseal has not yet been filed and the Post-Dispatch has not yet moved to unseal pursuant to E.D. Mo. L.R. 4.01(a)) such that no response to the Motion to Unseal is due. To the extent Defendants' response to the proposed Motion to Unseal is construed to be due April 21, 2023, Defendants respectfully request an extension of time of 14 days, up to and including May 5, 2023, within which to file their response. This extension, requested in the alternative, is necessary in light of multiple depositions and deadlines since the filing of Post-Dispatch's Motion and pending deadlines in other complex cases, including briefing deadlines relative to four complex *Daubert* motions pending in another case before this Court, a reply brief

WHEREFORE, Defendants advise the Court that they have no objection to the Motion to Intervene and request, in the alternative, an extension of time of 14 days within which to respond to the proposed Motion to Unseal.

Respectfully submitted,

SHEENA HAMILTON
CITY COUNSELOR

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CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2023, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system.

/s/ Andrew D. Wheaton

in the Eighth Circuit in a complex Rule 23(f) interlocutory appeal due May 2, 2023, three depositions scheduled on April 24th and 25th, and other intervening obligations associated with counsel's caseload.